UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE AUG 22 1985

36899

SUBJECT National Gypsum Company - Site Operations Plan (SOP)

Lisa Gatton

FROM Lisa Gatton, Quality Assurance Chemist
Monitoring Management Branch

TO Nigel Robinson, Project Officer
Site Investigation and Compliance Branch

The SOP and QAPP for National Gypsum Company site has been reviewed for organics and metals sampling and analysis. Those protocols pertaining to asbestos are being reviewed by the Air Monitoring Section of the Surveillance and Monitoring Branch. As soon as I receive those comments, I will forward them to you. The following items, however, must be addressed for this part of the review before the plan can be approved.

1. p.2-7. The split spoon decontamination procedure should include a hexane rinse and a deionized water rinse following the methanol rinse. Or, this procedure could be replaced by steam cleaning.

2. p.2-26. We do not recommend the use of a galvanized steel well casing, especially since metals samples will be taken. We recommend the use of the more durable stainless steel 316 or Teflon for the well casing and screen with the option to use PVC casing above the saturated zone.

3. p.2-9. Here again we do not recommend the use of PVC for the entire well casing because of possible leaching. See #2 above.

4. p.2-23 and p.2-26. The decontamination procedure for sampling equipment (including bailers) between samples should include hexane and deionized water rinses following the methanol rinse.

5. p.2-23. The homogenization procedure described for replicate sampling is not acceptable for use on volatile organic samples. Replicate volatile samples cannot be mixed because of the possibilities of loss of some constituents.

6. p.2-26. The bailer must have a cord attached which is composed of Teflon coated wire, single strand stainless steel wire or chain or polypropylene monofilament. Nylon cord is not acceptable.

7. p.2-26 and Short Form Table 5-2. We do not accept dissolved metals analyses unless the project officer provides adequate justification. The more comprehensive total metals analysis is preferred.

8. p.2-29. The sampling procedure for a tap or spigot should include the removal of any aerating device to avoid loss of volatile compounds.

9. Short Form p.5-2. Copies of the "Modified" Methods 608, 624, and 625 should be included. I am unfamiliar with an acceptable "modified" version of any of these methods.

   Also, the use of sodium thiosulfate in volatile organics samples is only recommended if residual chlorine is present. It is not a preservative. The holding time for volatile organics without acid preservative is 7 days not 14, according to 40 CFR 136, October 26, 1984.

10. Short Form Table 5-3. This table in conjunction with Table 5-1 is somewhat confusing. It should state that for every matrix, 10% of the samples will be collected in duplicate and that a trip blank shall accompany every shipment of volatile organic samples. Field blanks are not required, but are optional.

11. p.5-15. Each bottle label should include the following information:

    1. site name
    2. sample number
    3. name of collector
    4. date and time of collection
    5. place of collection
    6. type of sample (comp/grab)
    7. sample volume
    8. analysis required
    9. preservative

12. I request that you provide this office with the results of the performance audits performed by both YWC, Inc. and Princeton Testing Laboratory. If the results of these audits are not acceptable to this office, we will recommend you provide the lab with a USEPA performance evaluation sample included with the samples taken from the site.